

IN THE CIRCUIT COURT OF CRAWFORD COUNTY, ARKANSAS
DOMESTIC RELATIONS DIVISIONS

CRISTY HARP

PLAINTIFF

Vs.

CASE NO. 17DR-18-_____

KEVIN HARP

DEFENDANT

COMPLAINT FOR
ABSOLUTE DIVORCE

COMES NOW Plaintiff, Cristy Harp, by and through her attorney, Lucas S. Gramlich of Medlock & Gramlich, LLP, and for her Complaint for Absolute Divorce, states:

1. Plaintiff is a resident and domiciliary of Crawford County, State of Arkansas, and has been a resident of the State of Arkansas for more than sixty days prior to the filing of this Complaint. Defendant is a resident of Crawford County, State of Arkansas.
2. This Court has jurisdiction over the parties and the subject matter arising herein pursuant to the provisions of Ark. Code Ann. § 9-12-301; venue is proper pursuant to the provisions of Ark. Code Ann. § 9-12-303.
3. The parties were married on or about May 31, 1995. Said marriage is not a covenant marriage under the *Covenant Marriage Act of 2001*, codified at Ark. Code Ann. § 9-11-801, *et seq.*
4. The parties lived together as husband and wife until on or about May 4, 2017, whereupon they separated. The parties have lived separate and apart since that time.

5. Neither party is a member of the armed services of the United States.

6. There is one (1) minor child born of the parties, namely K.H., date of birth June 7, 2005; Plaintiff is the proper person to be awarded the care and custody of the minor child; that if the parties cannot agree upon visitation, the Court should order visitation with the Defendant as it sees fit, if any. The Defendant should pay a reasonable sum in child support; maintain a policy of medical and dental insurance for the minor child; and be responsible for one-half of all medical, dental and eye care expenses not covered by such insurance.

7. There are real and personal property rights and debt responsibilities to be adjudicated if the parties cannot agree to an equitable distribution of same.

8. During the course of the marriage, Defendant has inflicted such personal indignities upon Plaintiff so as to entitle Plaintiff to a divorce pursuant to the provisions of Ark. Code Ann. § 9-12-301(3).

9. The parties should be restrained from doing, attempting to do, or threatening to do, any act injuring, mistreating, molesting, or harassing the adverse party, or child of the parties; and for all other relief which this Court deems equitable and just.

WHEREFORE, Plaintiff prays that she be awarded a decree of absolute divorce from the bonds of matrimony to Defendant; Plaintiff be awarded custody of the minor child as set forth herein above with the Defendant having visitation as the Court sees fit, if any; that the Defendant be ordered to pay a reasonable sum of child support, maintain insurance as set forth herein above, and be responsible for one-half of all health care of the child as set forth above; that the parties be restrained from doing, attempting to

do, or threatening to do any act injuring, mistreating, molesting or harassing the adverse party, or child of the parties; for a temporary hearing to establish temporary possession of real and personal property, temporary orders regarding the ongoing financial obligations of the family, temporary custody, visitation and support of the parties' minor child; suit money, etc.; that the parties' real and personal property rights and debt responsibilities be adjudicated; for her costs incurred herein, including a reasonable attorney's fee; and for all other relief which this Court deems equitable and just.

Respectfully Submitted by:
CRISTY HARP

By: 

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